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Counter-Defendant, Pro Se

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

LAW OFFICES OF CHRISTY LEE, P.C.,  
Plaintiff,

v.

MEGHAN RAE and MANIFEST  
LEGAL, LLLC,  
Defendants.

Case No. 3:24-cv-00176-SLG

MEGHAN RAE,  
Counter-Plaintiff,

v.

LAW OFFICES OF CHRISTY LEE, P.C.,  
and CHRISTY LEE, Individually,  
Counter-Defendants.

Plaintiff's and Counter-Defendants' Supplemental  
Discovery Responses Per 6/26/25 Order  
*Law Offices of Christy Lee, P.C. v. Meghan Rae et al.*, Case No. 3:24-cv-00176-SLG  
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**PLAINTIFF'S AND COUNTER-DEFENDANTS'**  
**SUPPLEMENTAL DISCOVERY RESPONSES PER 6/26/25 ORDER**

Subject to previously stated objections, and without waiving them, Plaintiff and Counter-Defendants hereby supplement their prior responses to certain discovery requests to comply with the Court's June 26, 2025 Order.

**INTEROGATORY NO. 3:** Identify with particularity the documents and/or information in Meghan Rae's possession that You claim derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

**SUPPLEMENTAL ANSWER:** LOCL considers every single document in its database a potential template to use to assist in future work. In particular, LOCL identifies the templates listed on Bates Nos. MR 000844. The value of the templates will be addressed by expert testimony and will be disclosed when expert reports are due.

**INTEROGATORY NO. 5:** List all third parties, including but not limited to Bar Associations, Police Departments, IRS, Credit Bureaus, etc., that You (and/or Plaintiff) have contacted to report alleged misconduct by Meghan Rae since September 15, 2023 to the present. Include with each the date of Your contact, the form of Your contact (phone, writing, in-person), and the reason for Your contact.

**SUPPLEMENTAL ANSWER:** Lee has contacted the following in connection

with the data breach caused by Meghan Rae:

- (1) The Alaska Bar Association on December 3, 2023 via the filing of a bar complaint, which speaks for itself and which Meghan Rae already has a copy;
- (2) The Federal Bureau of Investigation via multiple telephone calls over time, the latest being on July 11, 2025; and
- (3) The Federal Trade Commission via a telephone call made sometime around February 2025.

**INTEROGATORY NO. 6:** Identify all former employees of the Plaintiff, including the attorney who said working for You was like working for the devil. For each person provide their full name, last known address, email address, telephone number, and employer.

**SUPPLEMENTAL ANSWER:** The following individuals are former employees who worked for LOCL at some point between September, 2018 and September, 2023 together with last known contact information for each.

1. Blair Dixon  
1605 Yarmouth Drive  
Mansfield, TX 76063  
817-437-4391  
Employer: unknown

2. Francis Baker  
7020 Mapleshade Way  
Aubrey, TX 76227  
817-233-3360  
Employer: Robolink, Inc.
3. Mary DeSpain  
6300 Quiet Circle  
Anchorage, AK 99502  
No telephone number on file  
Employer: unknown
4. Starra Besh  
Knik-Goose Bay Road  
Wasilla, AK 99623  
907-744-3000  
Employer: State of Alaska
5. Nicole Kneale  
4900 West Fairview Loop  
Wasilla, AK 99654  
907-980-4486  
Employer: Wasilla Dental Center

**INTEROGATORY NO. 9:** Identify each client that Plaintiff claims Meghan Rae contacted “and falsely claimed that Christy Lee was planning to retire and did not have time to work on their cases, and misled clients into believing that previous invoices from Plaintiff were incorrect and that Plaintiff owed them money.” For each such client include (a) their full name, a current address, email address, telephone number, and current employer, (b) the date the client contacted Plaintiff regarding the above, (c) who the client spoke with, and (d) the specific details of each conversation.

**SUPPLEMENTAL ANSWER:** Ms. Rae contacted the following individuals

to LOCL's knowledge and defamed Ms. Lee:

1. John Redden  
645 G Street, Suite 100-907  
Anchorage, AK 99501  
Great Northern Cannabis  
Phone Number 816-830-6978  
Email [jredden@greatnortherncannabis.com](mailto:jredden@greatnortherncannabis.com).

In September 2023 after Meghan's exit from employment with LOCL, she contacted Mr. Redden. In the latter part of September, Ms. Rae called Mr. Redden. She stated that she was leaving the firm to start her own solo firm and she would be better suited to take over his case because Ms. Lee was planning to retire and didn't have time for his case. He declined and told her he was not interested in going with her to her new firm. Later, Ms. Rae emailed him on April 12, 2024, again soliciting his business.

2. Tony Lerma, self-employed  
6741 East 10th Ave.  
Anchorage, AK 99504 (last known address)  
Phone number 907-632-3500  
Email [tlerma@gci.net](mailto:tlerma@gci.net)

Mr. Lerma called approximately 4 times in a 2-day period around April or May 2024 demanding that Ms. Lee reimburse him for owed funds. He spoke with Laura Hogins and then with Christy Lee. Mr. Lerma insulted Ms. Hogins and demanded money but agreed that he had received all his invoices, although he had stated in an email he had only received 1 invoice. When Ms. Lee spoke with Mr. Lerma, he stated

that Ms. Rae called him and told him that he was owed money and Ms. Lee better pay up. He was irate. Ms. Lee gave him her attorney's information.

3. Chris Brecht  
Manley Brautigam Bankston P.C.  
1127 W. 7<sup>th</sup> Ave.  
Anchorage, AK 99501  
Phone number 907-334-5600  
Email [chrisb@mbb.law](mailto:chrisb@mbb.law).

Sometime in December 2023, Ms. Rae falsely told Mr. Brecht that there was \$18,895 in trust for JP Freie knowing it was untrue.

**INTEROGATORY NO. 10:** Identify each client Plaintiff was referring to in the follow quote: "the Firm's clients have been reassured by the fact that not only is the Firm fighting Lawyer Rae for her theft of their personal data, but that Ms. Lee herself is leading the fight." (See Plaintiff's Opposition to Defendant's Motion to Prevent Contact by Christina Lee, filed June 10, 2024, pg 39). For each such client include (a) their full name, current address, email address, telephone number, and current employer.

**SUPPLEMENTAL ANSWER:** LOCL filed suit against Ms. Rae to recover LOCL's equipment (laptop and cell phone), but more importantly, because it did not want LOCL's clients suing it or Ms. Lee and claiming they had not done enough to try to recover their private and confidential information that Ms. Rae had dataminced. No specific client was being referenced in that statement.

**INTEROGATORY NO. 11:** Identify any demands, grievances or complaints made against you by any current or former employee, including identification of the employee, the dates of their employment, the nature of the complaint(s), and -if applicable- the reason the employment relationship ended.

**SUPPLEMENTAL ANSWER:** None other than the allegations alleged by Meghan Rae in her counterclaim. Ms. Rae was employed from September, 2018 until September 15, 2023. Her resignation from employment was accepted effective immediately when LOCL discovered she had taken information she was not authorized to take. The nature of her complaints are set forth in the Counterclaims in this lawsuit. Before her employment ended, there were no “demands, grievances or complaints made against” Lee or LOCL by Meghan Rae to the best of its knowledge.

**REQUEST FOR PRODUCTION NO. 1:** Produce in its native format (word file), and with all of its original metadata, the “Office Policy” which You claim was sent to Meghan Rae at the start of her employment in 2018.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 002857-002873. Copies of the Word documents that were saved and optimized in the Bates numbered PDF are also being produced as Bates Nos. LOCL 019645-019649 in the name of the documents but not in the body.

**REQUEST FOR PRODUCTION NO. 3:** Produce in its native format (pdf file), with all of its original metadata, the most recent six invoices prior to September

15, 2023 and all the invoices since September 15, 2023 for the following clients:

MA	BW	DW	DP
MS	WN	JR	SMD
SB	CM	JN	JH
BE	MH	BM	M
DJ	DS	PS	NG
SW	MP	TH	LC
JD	DP		

**SUPPLEMENTAL RESPONSE:** LOCL maintains that its invoices to its clients are confidential and subject to the attorney-client privilege. However, given the Court's June 26, 2025 Order, LOCL is producing the invoices it was ordered to produce. They are not redacted, but are being designated as confidential per the terms of the Protective Order entered on October 10, 2024 and subject to LOCL's previously stated objections to producing the same. *See* Bates Nos. LOCL 002874-003474. Bates Nos. LOCL 003475-003505 have been withheld pending the Court's review and decision on SW's motion to intervene and objection to the production of his records.

NOTE: Because LOCL was forced to migrate from Time Matters to CLIO, all of the invoices being produced were pulled from TimeSlips as the original invoices were not migrated to CLIO and are no longer accessible through Time Matters. Further, "JD" was not a client of LOCL's, his mother was. Her invoices are being produced in response to Request for Production No. 33. Additionally, "WN" was not a client of LOCL's, his father was. His father's invoices are being produced in response to Request for Production No. 33.



**REQUEST FOR PRODUCTION NO. 4:** Produce in its native format (pdf file), with all of its original metadata, all invoices between September 10, 2018 and September 15, 2023 for the following clients: R.C., S.T., J.P.F., and T.L..

**SUPPLEMENTAL RESPONSE:** LOCL maintains that its invoices to its clients are confidential and subject to the attorney-client privilege. However, given the Court's June 26, 2025 Order, LOCL is producing the invoices it was ordered to produce. They are not redacted, but are being designated as confidential per the terms of the Protective Order entered on October 10, 2024 and subject to LOCL's previously stated objections to producing the same. *See* Bates Nos. LOCL 003506 – 003796.

NOTE: Because LOCL was forced to migrate from Time Matters to CLIO, all of the invoices being produced were pulled from TimeSlips as the original invoices were not migrated to CLIO and are no longer accessible through Time Matters. R.C., S.T. and T.L. apparently are all current clients of Meghan Rae and/or Manifest Legal and she has copies of their files, which would have contained their original invoices.

**REQUEST FOR PRODUCTION NO. 5:** Produce in its native format (excel file), with all of its original metadata, Plaintiff's Tiered Client List from September 2018 to present.

**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL 003797-003949. Copies of the Excel files that were saved and optimized in the Bates numbered PDF are also being produced as Excel files identified as Bates Nos. LOCL 019650-019657

in the name of the document, but not in the body. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024. The Excel documents are confidential as well, but cannot be marked as such without altering the documents. As such, they are designated as confidential via this response.

**REQUEST FOR PRODUCTION NO. 6:** Produce in its native format (word, pdf, excel) and with all of its original metadata, all reports, complaints, grievances, etc. identified in Your Answer to Interrogatory No. 5.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 003950-004027 and LOCL 004070-004189.<sup>1</sup> Credit card numbers on two Bank of America statements (LOCL 004123-004124) have been redacted but all other redactions were made before the documents were submitted to the Alaska Bar Association, so the documents are as they were provided to the Alaska Bar Association. There are no other responsive records.

**REQUEST FOR PRODUCTION NO. 7:** Produce a copy of any and all audits of Meghan Rae's activity in the Firm's Time Matters database which allegedly prove that Meghan Rae has taken all contact information of Plaintiff's clients prior to her departure.

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<sup>1</sup> Bates Nos. LOCL 004028 -004069 were inadvertently skipped and not used.

**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL.004190-004376. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 9:** Produce any documents or evidence You have to support Plaintiff's allegation that Meghan Rae "sent to the 'trash can' a substantial number of critical documents, emails, and internal messages" and then "opened the 'trash can' of the Time Matter system and permanently deleted the item, to cover her tracks."

**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL 004190-004376, the unredacted Time Matters Audit. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024. LOCL expects its retained expert will testify to the deletion of the trash can, but it does not have an expert report from him yet because one is not due. That report will be produced when it is due under the Court's new pretrial deadlines.

**REQUEST FOR PRODUCTION NO. 11:** Produce a copy of any documents or evidence You have to support Your allegation that Meghan Rae "deleted emails associated with her on the server."

**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL 004190-004376, the unredacted Time Matters Audit. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on

October 10, 2024. LOCL expects its retained expert will testify to the deletion of the emails associated with her on the server, but it does not have an expert report from him yet because one is not due yet. That report will be produced when it is due under the Court's new pretrial deadlines.

**REQUEST FOR PRODUCTION NO. 12:** Produce a copy of any other claimed "forensic investigation," "audit," or "report" not already produced above, that You have conducted or prepared or directed to be conducted or prepared regarding Meghan Rae.

**SUPPLEMENTAL RESPONSE:** None at this time other than the Time Matters Audit, produced herein as Bates Nos. LOCL 004190-004376. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 14:** Produce a copy of Your Outlook Calendar from January 2022 to the present.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 004377-005664. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 15:** Produce a copy of Meghan Rae's Outlook Calendar from January 2022 to October 2023.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 005665-006303. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 16:** Produce in their native format, all emails received or sent by [mrae@christyleelaw.com](mailto:mrae@christyleelaw.com) from September 15, 2023 to the present.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 006304-008046. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 19:** Produce in their native format, all of Plaintiff's cellphone billing statements related to phone number 907-773-2478 from January 1, 2022 to September 31, 2023. Including, but not limited to, the cellphone billing statements that "showed that on September 1, 2023, [Schack] Law Group called Plaintiff's cellphone that Plaintiff gave Defendant Rae."

**SUPPLEMENTAL RESPONSE:** No responsive documents exist as neither LOCL nor Lee ever owned a phone assigned the number 907-773-2478.

**REQUEST FOR PRODUCTION NO. 20:** If not produced in response to the above, produce in their native format, all of Plaintiff's cellphone billing statements that showed that Meghan Rae "continued to talk and text extensively with Plaintiff's former client, [R.C.], following the completion of Plaintiff's legal services in 2022."

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 008047-008243. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 23:** Produce in its native format, with all of its original metadata, Plaintiff's bank statements from all bank accounts in Plaintiff's name from December 1 2020, to the present.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 008244-009219. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024. Further, account numbers have been redacted.

**REQUEST FOR PRODUCTION NO. 24:** Produce in its native format, with all of its original metadata, Plaintiff's Time Matter's year end gross income reports for calendar years 2021, 2022, and 2023.

**SUPPLEMENTAL RESPONSE:** No responsive documents exist because Time Matters does not have, and never had, any such report nor does Time Matters track Accounts Receivable.

**REQUEST FOR PRODUCTION No. 25:** Produce in its native format, with all of its original metadata, Plaintiff's corporate tax returns for tax years 2021, 2022, and 2023.



**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL 009220-009272. All

records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024. Further, social security numbers and EIN numbers have been redacted.

**REQUEST FOR PRODUCTION NO. 27:** Produce the emails You sent to Marc Enzi, Lynda Limon, and R.C. in 2021 notifying them that You were no longer representing R.C.

**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL 009273-009276. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 32:** Produce all written communications – including but not limited to emails, letters, and notes from oral communication – sent or received by Ms. Lee or any employee of the firm to anyone (whether inside or outside the firm) on or after September 15, 2023 that references Ms. Rae in any capacity. This includes without limitation all emails sent or received from [mrae@christyleelaw.com](mailto:mrae@christyleelaw.com).

**SUPPLEMENTAL RESPONSE:** *See* Bates Nos. LOCL 009277-009382, 009839-009840, 009405-009406, and 009413-009418. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024. *See also* Privilege Log regarding

withheld documents Bates Numbered LOCL 009383-009388, 009391-009404, and 009407-009412.

Additional responsive documents may be identified via the ESI searches that are not yet completed. If they are, this response will be supplemented to produce the same.

**REQUEST FOR PRODUCTION NO. 33:** Provide all invoices between January 1, 2021 and October 31, 2023 for any client for whom Ms. Rae worked at least ten (10) hours or more over the course of her employment.

**SUPPLEMENTAL RESPONSE:** LOCL maintains that its invoices to its clients are confidential and subject to the attorney-client privilege. However, given the Court's June 26, 2025 Order, LOCL is producing the invoices it was ordered to produce. They are not redacted, but are being designated as confidential per the terms of the Protective Order entered on October 10, 2024 and subject to LOCL's previously stated objections to producing the same., *See* Bates Nos. LOCL 009419-10817. Invoices issued to S.W., bates numbered LOCL 10683-10723 are being withheld pending resolution of his motion to intervene and objections to the production of his invoices. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

**REQUEST FOR PRODUCTION NO. 34:** Produce the entire client file maintained by the Law Offices of Christy Lee, P.C. for client J.P.F., including all invoices and estate planning documents prepared by the Law Offices of Christy Lee,



P.C. for J.P.F.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 010818-018271.

All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

NOTE: The only redactions LOCL has made to the file are the account numbers on trust checks. See Privilege Log. Any other redactions that may exist in the file were redactions made by Manley & Brautigam to the J. H. Freie documents before providing copies to LOCL.

**REQUEST FOR PRODUCTION NO. 35:** According to J.P.F.'s invoices he paid the Law Offices of Christy Lee, P.C. \$20,000 on 12/16/2020, on 12/17/20, and again on 1/22/2021 for a total of \$60,000. Produce all documents tracking the receipt, deposit into client's trust account (or other account), and withdrawal of these funds.

**SUPPLEMENTAL RESPONSE:** See Bates Nos. LOCL 018272-018279. All records produced in response to this request are being designated as confidential per the terms of the Protective Order entered on October 10, 2024.

Dated at Anchorage, Alaska this 25<sup>th</sup> day of July, 2025.

COLBO LAW OFFICE, LLC  
Attorneys for Plaintiff and  
Counter-Defendant  
Law Offices of Christy Lee, P.C.,

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CHRISTY LEE, Individually  
Counter-Defendant

By: /s/ Christy Lee  
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1215 W. 8<sup>TH</sup> AVE.  
Anchorage, AK 99501  
Telephone: (907) 339-9931  
[clee@christyleelaw.com](mailto:clee@christyleelaw.com)

CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy  
of the foregoing was served via email  
on the 25<sup>th</sup> day of July, 2025.

Jahna M. Lindemuth  
Caitlin Maeve Kendall  
Cashion Gilmore & Lindemuth  
[jahna@cashiongilmore.com](mailto:jahna@cashiongilmore.com)  
[maeve@cashiongimmore.com](mailto:maeve@cashiongimmore.com)

Christy Lee  
[clee@christyleelaw.com](mailto:clee@christyleelaw.com)

/s/ Kimberlee A. Colbo  
Kimberlee A. Colbo

### **OBJECTION AND PRIVILEGE LOG**

Bates No.	Document Description	Privilege/Basis For Withholding
LOCL 009383-009385	2/14/24 Email string between Christy Lee and Berkley Select regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009386	2/19/24 Email from Laura Hogins to Berkley Select regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009387-009388	2/22/24 Email string between Christy Lee and Annette Blair with Alaska Bar Association regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009391-009392	Letter from Annette Blair to Christy Lee regarding Bar Complaint (undated)	Alaska Bar Rule 22(b)
LOCL 009393-009394	2/21/25 Letter from Steve Wells to Alaska Bar Association regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009395	2/21/25 Email from David LeNorman to Christy Lee regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009396-009397	2/24/25 Emails from and to John Redden to Christy Lee regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009398	2/23/25 Email From Sam Benson to Christy Lee regarding Bar Complaint	Alaska Bar Rule 22(b)

Objection and Privilege Log

*Law Offices of Christy Lee v. Meghan Rae et al.*, Case No. 3:24-cv-001760-SLG

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LOCL 009399	Letter from Brian Duwe To Whom It May Concern regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009400-009401	2/23/25 Letter from Nicholas Gelinas to Christy Lee regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009402	2/24/25 Email from Tom Habermann regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009403	2/24/25 Letter from John Redden regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009404	2/26/25 Email from Danielle Peters regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009407	3/4/24 Email from Christy Lee To David Case and Annette Blair regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009408	4/16/24 Email from Christy Lee to Carolina Casualty regarding Bar Complaint	Alaska Bar rule 22(b)
LOCL 009409	7/17/24 Email String Between Christy Lee and Norma Gallegos regarding Malpractice Insurance Renewal and Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009410	10/1/24 Email to David Case from Christy Lee regarding Bar Complaint	Alaska Bar Rule 22(b)
LOCL 009411-009412	Undated Email between Christy Lee and Berkley Select regarding bar Complaint	Alaska Bar Rule 22(b)

LOCL 003475-LOCL 003505	LOCL Invoices To Steven Wells Responsive to RFP No. 33	Invoices are being withheld pending the Court's decision on Mr. Wells' Motion To Intervene
LOCL 10683-LOCL 010723	LOCL Invoices To Steven Wells Responsive to RFP No. 33	Invoices are being withheld pending the Court's decision on Mr. Wells' Motion To Intervene
LOCL 014613, LOCL 014706, LOCL 15816, and LOCL 15821	Bank Account Numbers Redacted	Privacy and confidentiality

Objection and Privilege Log

*Law Offices of Christy Lee v. Meghan Rae et al.*, Case No. 3:24-cv-001760-SLG

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